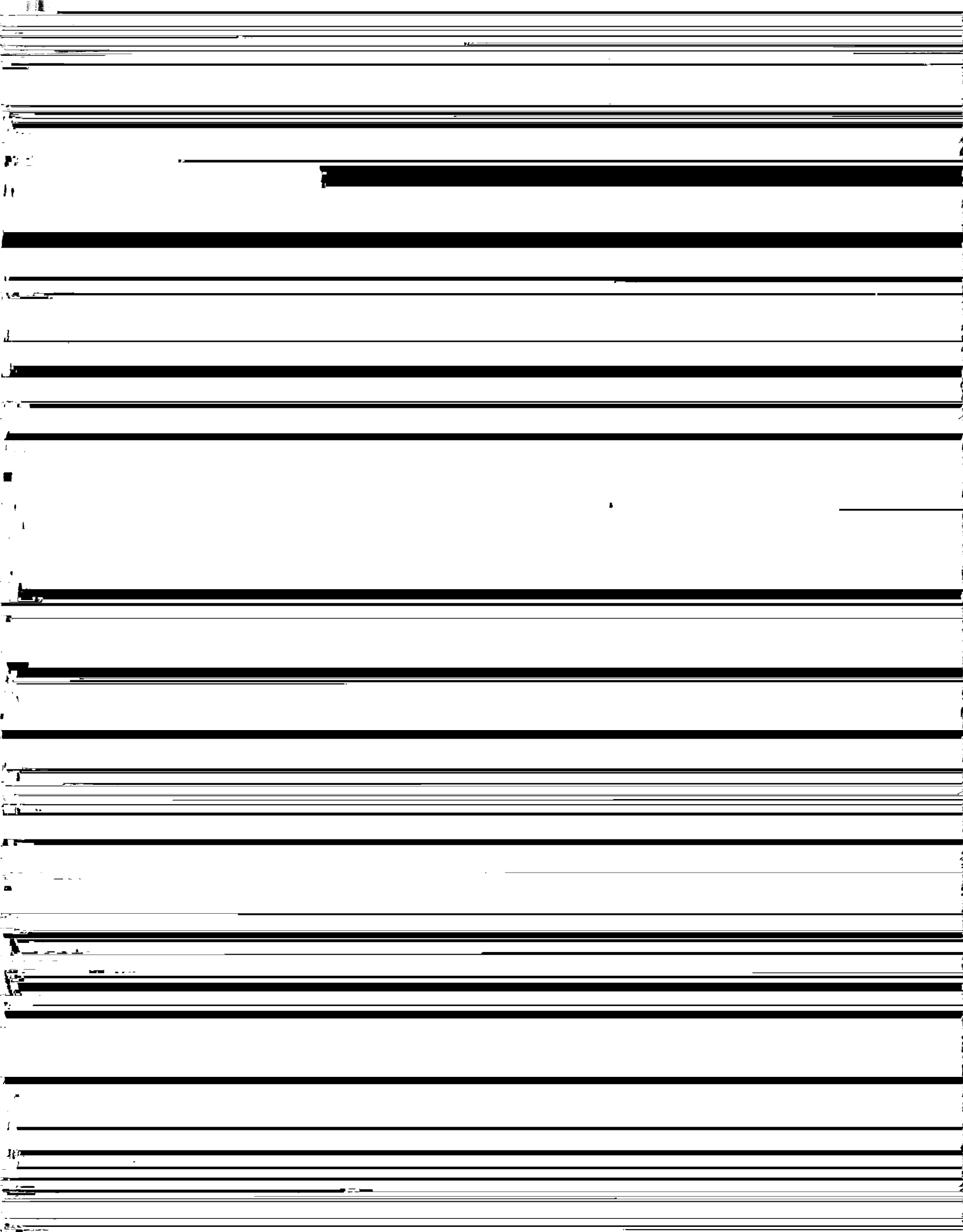

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

92-257

In the Matter of	)	
	)	
Amendment of the Commission's	)	RM-7956
Rules Concerning Maritime	)	RM-8031
Communications	)	

To: The Commission

COMMENTS

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June 1, 1993

Before The

Federal Communications Commission

Washington, D.C. 20554

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In the Matter of	)	
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To: The Commission

COMMENTS

Global Communications Corporation (hereinafter "Global"), by its attorney, hereby submits its Comments in the matter captioned above, in response to the Notice of Proposed Rule Making and Notice of Inquiry released by the Commission on November 30, 1992, 7 FCC Rcd 7863 (1992). Global operates Public Coast Station WAH in St. Thomas, Virgin Islands.

The Commission's Notice raises a variety of issues affecting maritime communications. In light of the variegated nature of the issues raised, it is important to emphasize at the outset the appropriate priority among them. The most important question raised by far, in Global's opinion, is the improvements that will need to be made to implement effectively the Global Maritime Distress and Safety System ("GMDSS"). GMDSS has the potential to improve marine safety significantly. If, however, non-compulsory vessels are not also made fully compatible with GMDSS, there will occur a substantial reduction in marine safety. The root of the problem is that under the currrently provided changes in the Commission's rules, the new GMDSS provisions apply only to cargo ships

of at least 300 tons gross tonnage and passenger ships when traveling on international voyages or on the high seas.[1]

While GMDSS may be a major step forward, it could also create some major new problems unless certain changes are made with respect to the communications equipment used by the very large number of non-compulsory vessels. Because under GMDSS mandatory vessels will cease watchkeeping of VHF Channel 16 and 2182 MHz on February 1, 1999, there may develop a profound safety problem when some vessels use the GMDSS system and others use the systems employed to date.

It must be recognized that "the communications link between GMDSS ships and small vessels will be lost after February 1, 1999." Amendment of Parts 13 and 80 of the Commission's Rules to Implement the Global Maritime Distress and Safety System (GMDSS) to Improve the Safety of Life at Sea, 7 FCC Rcd 951, 962 (1992). Global strongly supports the importance of the observation by the United States Coast Guard that "unless steps are taken to insure radio interoperability between compulsory ships fitted with the GMDSS and voluntary ships which are not, this opportunity for improved safety could instead result (in) increased collisions at sea and other hazards, reducing marine safety." [2]

Any adequate safety system must insure interoperability among all classes of vessels. The alternative would be a major loss in the level of public safety at sea. It is Global's experience that, of all the maydays and other life threatening emergencies that it has handled over the last twelve years, only

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[1] Amendment of Parts 13 and 80 of the Commission's Rules to Implement the Global Maritime Distress and Safety System (GMDSS) to Improve the Safety of Life at Sea, 7 FCC Rcd 951, 953 (1992).

[2] USCG June 25, 1992 "Recommendation to Federal Communications Commission," page 2 paragraph 2

two have involved compulsory vessels and in each case the second vessel has been in the non-compulsory class.

An example in Global's experience may help illustrate the problem. The vessel Nedloid Antillies collided with a non-compulsory-coastal freighter and only upon hearing the voice distress message on Channel 16 from the small vessel did they know that they had collided with that vessel. This station, WAH, Virgin Islands Radio, received and handled this mayday, and with USCG's assistance coordinated the rescue of the crew. Had the GMDSS system been fully implemented the Nedloid Antillies would not have known of the collision until Global's WAH or the Coast Guard broadcast via the GMDSS system notice of the distress. This would have created a delay of several

The vast majority of distresses involve non-compulsory vessels and it is just these vessels that, under the present proposals, would be left out of the GMDSS system unless GMDSS compatibility is required not only of new marine VHF and HF SSB radios but also of old. All old (that is pre-GMDSS) radios must also be required to be retrofitted with at least a GMDSS guard receiver and transmitter. This unit could be installed between the existing radio and its antenna. It would be transparent to the use and function of the pre-GMDSS radio, but would have access to its antenna and display visually and audibly the receipt of DSC and GMDSS information directed to its selective calling code or GMDSS data broadcast within its receiving range. This add-on unit could also be an ELT device[3], and should be portable in the event of an emergency. It must be mounted in such a manner that it can be quickly removed -- that is pulled out of its holder/mount, so it can be taken aboard a life boat when abandoning ship. It would also have an antenna that would extend when it is removed from its mount.

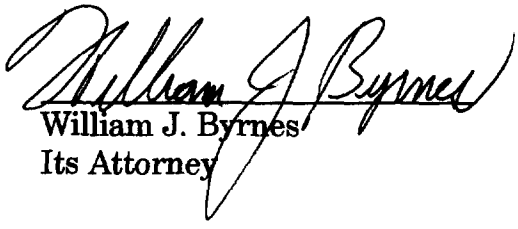
Combining a GMDSS/DSC and ELT into one add-on package would give vessels that desired to purchase, a simple and easy way to add on a package that gave them access to all of the functions. This unit in its minimum implementation would guard Channel 70 (the DSC/GMDSS channel) and transmit GMDSS emergency messages, while also transmitting on one or more ELT frequencies. More complex packages would contain the ability to transmit on VHF Channel 16 and other frequencies, such as Coast Guard channels.

[3] ELT's are small emergency transmitters that transmit on selected frequencies that are monitored by some shore stations and a series of satellites that can provide the location of the ELT device.

To the extent that the Commission might find it infeasible to bring all vessels, including the approximately one million estimated non-compulsory vessels, into the GMDSS system, it would appear appropriate to require continuation of the existing VHF capability of compulsory ships together with corresponding watch requirements in addition to GMDSS to insure the interoperability necessary to avoid collisions and permit the provision of assistance among differennt types of vessels.

Respectfully submitted,

GLOBAL COMMUNICATIONS CORP.



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June 1, 1993

CERTIFICATE OF SERVICE

I, Carol Park, an employee of Haley, Bader & Potts, hereby certifies that on this 1st day of June, 1993, copies of the foregoing COMMENTS of Global Communications Corporation were sent via first class, postage pre-paid mail to the following:

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